

PROPOSED CAAPP PERMIT
Naval Training Center/Great Lakes
I.D. No.: 097811AAC
Application No.: 95120330
December 30, 2004

217/782-2113

"REVISED"

TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT
and
TITLE I PERMIT¹

PERMITTEE

Naval Training Center/Great Lakes
Attn: Blayne Kirsch
201 Decatur Avenue, Building 1A
Great Lakes, Illinois 60088-5600

Application No.: 95120330

I.D. No.: 097811AAC

Applicant's Designation:

Date Received: December 8, 1995

Operation of: Military Training Center

Date Issued: November 18, 2002

Expiration Date²: November 17, 2007

Source Location: 201 Decatur Avenue, Building 1A, Great Lakes, Lake County

Responsible Official: Mark R Schultz, Commander Navy Region Midwest, Environmental Programs, Director

This permit is hereby granted to the above-designated Permittee to OPERATE a Naval Training Center, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

Revision Date Received: November 15, 2004

Revision Date Issued: TO BE DETERMINED

Purpose of Revision: Significant Modification

This Permit has been revised for more accurate clarification of non-major HAP status of this source through newly established federally enforceable limits keeping this source below major source HAP applicability threshold. This non-major HAP status excludes boilers, engines, and turbines from applicability of respected MACT standards and requirements.

If you have any questions concerning this permit, please contact Anatoly Belogorsky at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:AB:psj

cc: Illinois EPA, FOS, Region 1

¹ This permit may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the CAA and regulations promulgated thereunder, including 40 CFR 52.21 - federal PSD and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within this permit.

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² Except as provided in Condition 8.7 of this permit.

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1.0 SOURCE IDENTIFICATION

1.1 Source

Naval Training Center/Great Lakes
201 Decatur Avenue, Building 1A
Great Lakes, Illinois 60088-5600
847/688-5999

I.D. No.: 097811AAC
Standard Industrial Classification: 4961, Steam Generation and
Distribution

1.2 Owner/Parent Company

Naval Training Center/Great Lakes
201 Decatur Avenue, Building 1A
Great Lakes, Illinois 60088-5600

1.3 Operator

Naval Training Center/Great Lakes
201 Decatur Avenue, Building 1A
Great Lakes, Illinois 60088-5600

J. Blayne Kirsch, Manager, Environmental Business Line
847/688-5999, ext.145

1.4 General Source Description

The Naval Training Center/Great Lakes is located at 201 Decatur Avenue, Building 1A (main address) in Great Lakes and operates numerous different emission sources used for normal operation of the Training Center.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

ACMA	Alternative Compliance Market Account
Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
ATU	Allotment Trading Unit
BAT	Best Available Technology
Btu	British thermal unit
°C	Degrees Celsius
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAM	Compliance Assurance Monitoring
Cd	Cadmium
CEMS	Continuous Emission Monitoring System
cfm	Cubic foot per minute
CFR	Code of Federal Regulations
CO	Carbon Monoxide
dscf	Dry standard cubic foot
dscm	Dry standard cubic meter
ERMS	Emission Reduction Market System
°F	Degrees Fahrenheit
ft	Feet
ft ³	Cubic Feet
G	Grams
gal	Gallons
gr	Grains
HAP	Hazardous Air Pollutant
HCl	Hydrogen Chloride
Hg	Mercury
HMIWI	Hospital/Medical/Infectious Waste Incinerator
hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
ILCS	Illinois Compiled Statutes
Illinois EPA	Illinois Environmental Protection Agency
kg	Kilogram
kW	kilowatts
L	liter
LAER	Lowest Achievable Emission Rate
lb	pound
MACT	Maximum Achievable Control Technology
mg	milligram
mmBtu	Million British thermal units
mmscf	Million standard cubic feet
mo	month
MW	Megawatts
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO _x	Nitrogen Oxides

Pb	Lead
NSPS	New Source Performance Standards
PM	Particulate Matter
PM ₁₀	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
ppm	parts per million
ppmv	Parts per million by volume
PSD	Prevention of Significant Deterioration
RMP	Risk Management Plan
scf	Standard cubic feet
scm	Standard cubic meters
SO ₂	Sulfur Dioxide
T	Ton
TEQ	Toxic equivalency
T1	Title I - identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New - identifies Title I conditions that are being established in this permit
T1R	Title I Revised - identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
USEPA	United States Environmental Protection Agency
VOM	Volatile Organic Material
wt. %	Weight percent
yr	year

3.0 INSIGNIFICANT ACTIVITIES

3.1 Identification of Insignificant Activities

The following activities at the source constitute insignificant activities as specified in 35 IAC 201.210:

- 3.1.1 Activities determined by the Illinois EPA to be insignificant activities, pursuant to 35 IAC 201.210(a)(1) and 201.211, as follows:

Small arms firing range ("Building 7315-Range-01")

- 3.1.2 Activities that are insignificant activities based upon maximum emissions, pursuant to 35 IAC 201.210(a)(2) or (a)(3), as follows:

Auto body repair and coating
Diesel fuel dispensing operations

- 3.1.3 Activities that are insignificant activities based upon their type or character, pursuant to 35 IAC 201.210(a)(4) through (18), as follows:

- a. Direct combustion units designed and used for comfort heating purposes and fuel combustion emission units as follows: (A) Units with a rated heat input capacity of less than 2.5 mmBtu/hr that fire only natural gas, propane, or liquefied petroleum gas; (B) Units with a rated heat input capacity of less than 1.0 mmBtu/hr that fire only oil or oil in combination with only natural gas, propane, or liquefied petroleum gas; and (C) Units with a rated heat input capacity of less than 200,000 Btu/hr which never burn refuse, or treated or chemically contaminated wood [35 IAC 201.210(a)(4)].
- b. Storage tanks of organic liquids with a capacity of less than 10,000 gallons and an annual throughput of less than 100,000 gallons per year, provided the storage tank is not used for the storage of gasoline or any material listed as a HAP pursuant to Section 112(b) of the CAA [35 IAC 201.210(a)(10)].
- c. Storage tanks of any size containing virgin or re-refined distillate oil, hydrocarbon condensate from natural gas pipeline or storage systems, lubricating oil, or residual fuel oils [35 IAC 201.210(a)(11)].
- d. Coating operations (excluding powder, architectural and industrial maintenance coating) with aggregate VOM usage that never exceeds 15 lbs/day from all coating lines at the source, including VOM from coating, dilutents, and cleaning materials [35 IAC 201.210(a)(13)].

- e. Printing operations with aggregate organic solvent usage that never exceeds 750 gallons per year from all printing lines at the source, including organic solvent from inks, dilutents, fountain solutions, and cleaning materials [35 IAC 201.210(a)(14)].
- f. Gas turbines and stationary reciprocating internal combustion engines of less than 112 kW (150 horsepower) power output [35 IAC 201.210(a)(15)].
- g. Gas turbines and stationary reciprocating internal combustion engines of between 112 kW and 1,118 kW (150 and 1,500 horsepower) power output that are emergency or standby units [35 IAC 201.210(a)(16)].

3.1.4 Activities that are considered insignificant activities pursuant to 35 IAC 201.210(b).

3.2 Compliance with Applicable Requirements

Insignificant activities are subject to applicable requirements notwithstanding status as insignificant activities. In particular, in addition to regulations of general applicability, such as 35 IAC 212.301 and 212.123 (Condition 5.2.2), the Permittee shall comply with the following requirements, as applicable:

- 3.2.1 For each cold cleaning degreaser, the Permittee shall comply with the applicable equipment and operating requirements of 35 IAC 215.182, 218.182, or 219.182.
- 3.2.2 For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate matter emission limit of 35 IAC 212.321 or 212.322. For example, the particulate matter emissions from a process emission unit shall not exceed 0.55 pounds per hour if the emission unit's process weight rate is 100 pounds per hour or less, pursuant to 35 IAC 266.110.
- 3.2.3 For each organic material emission unit that uses organic material, e.g., a mixer or printing line, the Permittee shall comply with the applicable VOM emission limit of 35 IAC 215.301, 218.301, or 219.301, which requires that organic material emissions not exceed 8.0 pounds per hour or do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.

3.3 Addition of Insignificant Activities

- 3.3.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1, until the renewal application for this permit is submitted, pursuant to 35 IAC 201.212(a).

- 3.3.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.
- 3.3.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Date Constructed	Emission Control Equipment
Unit 1	Boilers	From 1941 to 1997	None
Unit 2	Engines and Turbines	1989; 2001; 2002	None
Unit 3	Gasoline Storage Tank and Dispensing Operations	1995; 1997; 2000	Stage I and Stage II
Unit 4	Perchloroethylene Dry Cleaning Units		In-build condenser

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of NO_x, VOM, CO, and SO₂ emissions.

5.2 Applicable Regulations

5.2.1 Specific emission units at this source are subject to particular regulations as set forth in Section 7 (Unit-Specific Conditions) of this permit.

5.2.2 In addition, emission units at this source are subject to the following regulations of general applicability:

- a. No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.
- b. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, pursuant to 35 IAC 212.123(a), except as allowed by 35 IAC 212.123(b) and 212.124.

5.2.3 Ozone Depleting Substances

The Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

5.2.4 Risk Management Plan

Should this stationary source, as defined in 40 CFR Section 68.3, become subject to the Accidental Release Prevention regulations in 40 CFR Part 68, then the owner or operator shall submit [40 CFR 68.215(a)(2)(i) and (ii)]:

- a. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or
- b. A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan (RMP), as part of the annual compliance certification required by 40 CFR Part 70 or 71.

5.2.5 a. Should this stationary source become subject to a regulation under 40 CFR Parts 60, 61, or 63, or 35 IAC after the date issued of this permit, then the owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by 40 CFR Part 70 or 71.

- b. No later than upon the submittal for renewal of this permit, the owner or operator shall submit, as part of an application, the necessary information to address either the non-applicability of, or demonstrate compliance with all applicable requirements of any potentially applicable regulation which was promulgated after the date issued of this permit.

5.2.6 Episode Action Plan

- a. If the source is required to have an episode action plan pursuant to 35 IAC 244.142, the Permittee shall maintain at the source and have on file with the Illinois EPA a written episode action plan (plan) for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The plan shall contain the information specified in 35 IAC 244.144.
- b. The Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared.

- c. If a change occurs at the source which requires a revision of the plan (e.g., operational change, change in the source contact person), a copy of the revised plan shall be submitted to the Illinois EPA for review within 30 days of the change. Such plans shall be further revised if disapproved by the Illinois EPA.
- d. For sources required to have a plan pursuant to 35 IAC 244.142, a copy of the original plan and any subsequent revisions shall be sent to Illinois EPA, Compliance Section.

5.3 Non-Applicability of Regulations of Concern

This permit is issued based on the source not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, as explained further in Section 7 (Unit Specific Conditions).

5.4 Source-Wide Operational and Production Limits and Work Practices

In addition to the source-wide requirements in the Standard Permit Conditions in Section 9, the Permittee shall fulfill the following source-wide operational and production limitations and/or work practice requirements:

None

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

The annual emissions from the source, not considering insignificant activities as addressed by Section 3.0 of this permit, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be determined on a calendar year basis. These limitations (Condition 5.5.1) are set for the purpose of establishing fees and are not federally enforceable.

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	103.64
Sulfur Dioxide (SO ₂)	1,423.07
Particulate Matter (PM)	124.04
Nitrogen Oxides (NO _x)	664.96
HAP, not included in VOM or PM	----
Total	2,315.71

5.5.2 Emissions of Hazardous Air Pollutants

Source-wide emission limitations for HAPs from all operations operated at the source are limited to 9.0 tons per year of any individual HAP and 24.0 tons per year of aggregate HAP. These limits are established for purposes of keeping potential HAP emissions from the source to the limits below HAP major source thresholds. Therefore, this facility is excluded from applicability of several MACT standards as described further in Section 7 of this permit.

Compliance with annual HAP limits for the entire source shall be determined based on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).

5.5.3 Other Source-Wide Emission Limitations

None

5.6 General Recordkeeping Requirements

5.6.1 Emission Records

The Permittee shall maintain records of the following items for the source to demonstrate compliance with Conditions 5.5.1 and 5.5.2, pursuant to Section 39.5(7)(b) of the Act:

- a. Total annual emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions) of this permit.
- b. The Permittee shall maintain records of the following to demonstrate compliance with Condition 5.5.2:

Individual and aggregate HAP emissions based on a 12-month rolling average basis for the emission units covered by Section 7 (Unit Specific Conditions) of this permit. Unit Specific Conditions of Section 7 discuss more specifically recordkeeping requirements along with certain HAP emission factors used for individual emission units or group of emission units.

5.6.2 Retention and Availability of Records

- a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.

- b. The Permittee shall retrieve and print, on paper during normal source office hours, any records retained in an electronic format (e.g., computer) in response to an Illinois EPA or USEPA request for records during the course of a source inspection.

5.7 General Reporting Requirements

5.7.1 General Source-Wide Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the source with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

5.7.2 Annual Emissions Report

The annual emissions report required pursuant to Condition 9.7 shall contain emissions information for the previous calendar year.

5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating Emissions

Compliance with the source-wide emission limits specified in Conditions 5.5.1 and 5.5.2 shall be based on the recordkeeping and reporting requirements of Conditions 5.6 and 5.7, and compliance procedures in Section 7 (Unit Specific Conditions) of this permit.

6.0 EMISSIONS CONTROL PROGRAMS

6.1 NO_x Trading Program

6.1.1 Description of NO_x Trading Program

The NO_x Trading Program is a regional "cap and trade" market system for large sources of NO_x emissions in the eastern United States, including Illinois. It is designed to reduce and maintain NO_x emissions from the emission units covered by the program within a budget to help contribute to attainment and maintenance of the ozone ambient air quality standard in the multi-state region covered by the program, as required by Section 126 of the CAA. The NO_x Trading Program applies in addition to other applicable requirements for NO_x emissions and in no way relaxes these other requirements.

Emission units that are subject to the NO_x Trading Program are referred to as "budget units." Sources that have one or more budget unit subject to the NO_x Trading Program are referred to as budget sources.

The NO_x Trading Program controls NO_x emissions from budget units during a seasonal control period from May 1 through September 30 of each year, when weather conditions are conducive to formation of ozone in the ambient air. (In 2004, the first year that the NO_x Trading Program is in effect, the control period will be May 31 through September 30.) By November 30 of each year, the allowance transfer deadline, each budget source must hold "NO_x allowances" for the actual NO_x emissions of its budget units during the preceding control period. The USEPA will then retire NO_x allowances in the source's accounts in amounts equivalent to its seasonal emissions. If a source does not have sufficient allowances in its accounts, USEPA would subtract allowances from the source's future allocation for the next control period and impose other penalties as appropriate. Stringent monitoring procedures developed by USEPA apply to budget units to assure that actual emissions of NO_x emissions are accurately determined.

The number of NO_x allowances available for budget sources is set by the overall budget for NO_x emissions established by USEPA. This budget requires a substantial reduction in NO_x emissions from historical levels as necessary to meet air quality goals. In Illinois, separate rules have been established for the budget units that are electrical generating units (EGU) and for large units at manufacturing plants and institutions (non EGU), like the boilers at this source. Under these rules, the allocation or share of the NO_x allowances for non-EGU is set in an amount established by rule [35 IAC Part 217, Appendix E]. New budget unit, for which limited operating data may be available, may obtain NO_x allowances from the new source set-aside (NSSA), a portion of the overall budget reserved for new budget units.

In addition to directly receiving or purchasing NO_x allowances as described above, budget sources may transfer NO_x allowances from one of their units to another. They may also purchase allowances in the marketplace from other sources that are willing to sell some of the allowances that they have received. Each budget source must designate an account representative to handle all its allowance transactions. The USEPA, in a central national system, will maintain allowance accounts and record transfer of allowances among accounts.

The ability of sources to transfer allowances will serve to minimize the costs of reducing NO_x emissions from budget units to comply with the overall NO_x budget. In particular, the NO_x emissions of budget units that may be most economically controlled will be targeted by sources for further control of emissions. This will result in a surplus of NO_x allowances from those units that can be transferred to other units at which it is more difficult to control NO_x emissions. Experience with reduction of sulfur dioxide emissions under the federal Acid Rain program has shown that this type of trading program not only achieves regional emission reductions in a more cost-effective manner but also results in greater overall reductions than application of traditional emission standards to individual emission units.

The USEPA developed the plan for the NO_x Trading Program with assistance from affected states. Illinois' rules for the NO_x Trading Program are located at 35 IAC Part 217, Subpart U and W, for non-EGUs and EGUs, respectively. These rules have been approved by the USEPA. These rules provide for interstate trading of NO_x allowances, as mandated by Section 9.9 of the Act. Accordingly, these rules refer to and rely upon federal rules at 40 CFR Part 96, which have been developed by USEPA for certain aspects of the NO_x Trading Program, and which an individual state must follow to allow for interstate trading of allowances.

Note: This narrative description of the NO_x Trading Program is for informational purposes only and is not enforceable.

6.1.2 Applicability

- a. The following emission units are budget units for purposes of Illinois' NO_x Trading Program. Accordingly, this source is a budget source and the Permittee is the owner or operator of a budget source and budget units. In this section of this permit, these emission units are addressed as budget units.

Boiler #5 at Building #11, Central Steam Plant; and

Boiler #6 at Building #11, Central Steam Plant.

- b. This Permit does not provide "low-emitter status" for the above emission units pursuant to 35 IAC 217.472.

6.1.3 General Provisions of the NO_x Trading Program

- a. This source and the budget units at this source shall comply with all applicable requirements of Illinois' NO_x Trading Program, i.e., 35 IAC Part 217, Subpart U, and 40 CFR Part 96 (excluding 40 CFR 96.4(b) and 96.55(c), and excluding 40 CFR 96, Subparts C, E and I), pursuant to 35 IAC 217.456(a) and 217.456(f) (2).
- b. Any provision of the NO_x Trading Program that applies to a budget source (including any provision applicable to the account representative of a budget source) shall also apply to the owner and operator of such budget sources and to the owner and operator of each budget unit at the source, pursuant to 35 IAC 217.456(f) (3).
- c. Any provision of the NO_x Trading Program that applies to a budget EGU (including any provision applicable to the account representative of a budget unit) shall also apply to the owner and operator of such budget unit. Except with regard to requirements applicable to budget units with a common stack under 40 CFR 96, Subpart H, the owner and operator and the account representative of one budget unit shall not be liable for any violation by any other budget unit of which they are not an owner or operator or the account representative, pursuant to 35 IAC 217.456(f) (4).

6.1.4 Requirements for NO_x Allowances

- a. Beginning in 2004, by November 30 of each year, the allowance transfer deadline, the account representative of each budget unit at this source must hold allowances available for compliance deductions under 40 CFR 96.54 in the budget unit's compliance account or the source's overdraft account in an amount that shall not be less than the budget unit's total NO_x emissions for the preceding control period (rounded to the nearest whole ton), as determined in accordance with applicable monitoring requirements, plus any number of allowances necessary to account for actual utilization (e.g., for testing, start-up, malfunction, and shut down) under 40 CFR 96.42(e) for the control period, pursuant to 35 IAC 217.456(d) (1). For purposes of this requirement, an allowance may not be utilized for a control period in a year prior to the year for which the allowance is allocated, pursuant to 35 IAC 217.456(d) (4).

- b. The account representative of a budget unit that has excess emissions in any control period, i.e., NO_x emissions in excess of the number of NO_x allowances held as provided above, shall surrender allowances as required for deduction under 40 CFR 96.54(d)(1), pursuant to 35 IAC 217.456(f)(5). In addition, the owner or operator of a budget unit that has excess emissions shall pay any fine, penalty, or assessment, or comply with any other remedy imposed under 40 CFR 96.54(d)(3) and the Act, pursuant to 35 IAC 217.456(f)(6). Each ton of NO_x emitted in excess of the number of NO_x allowances held as provided above for each budget unit for each control period shall constitute a separate violation of 35 IAC Part 217 and the Act, pursuant to 35 IAC 217.456(d)(3).
- c. An allowance allocated by the Illinois EPA or USEPA under the NO_x Trading Program is a limited authorization to emit one ton of NO_x in accordance with the NO_x Trading Program. As explained by 35 IAC 217.456(d)(5), no provisions of the NO_x Trading Program, the budget permit application, the budget permit, or a retired unit exemption under 40 CFR 96.5 and no provision of law shall be construed to limit the authority of the United States or the State of Illinois to terminate or limit this authorization. As further explained by 35 IAC 217.456(d)(6), an allowance allocated by the Illinois EPA or USEPA under the NO_x Trading Program does not constitute a property right. As provided by 35 IAC 217.456(d)(2), allowances shall be held in, deducted from, or transferred among allowances accounts in accordance with 35 IAC Part 217, Subpart U, and 40 CFR 96, Subparts F and G.

6.1.5 Monitoring Requirements for Budget Units

- a. The Permittee shall comply with the monitoring requirements of 40 CFR Part 96, Subpart H, for the budget unit and the compliance of the budget unit with the emission limitation under 6.1.4(a) shall be determined by the emission measurements recorded and reported in accordance with 40 CFR 96, Subpart H, pursuant to 35 IAC 217.456(c)(1) and (c)(2).
- b. The account representative for the source and the budget unit at the source shall comply with those sections of the monitoring requirements of 40 CFR 96, Subpart H, applicable to an account representative, pursuant to 35 IAC 217.456(c)(1).

Note: Pursuant to 40 CFR 96.70(b), existing budget units are to begin complying with applicable monitoring requirements of 40 CFR Part 96 at least one year in advance of the start of the first control period governed by the NO_x Trading Program.

6.1.6 Recordkeeping Requirements for Budget Units

Unless otherwise provided below, the Permittee shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This 5-year period may be extended for cause at any time prior to the end of the 5 years, in writing by the Illinois EPA or the USEPA.

- a. The account certificate of representation of the account representative for the source and each budget unit at the source and all documents that demonstrate the truth of the statements in the account certificate of representation, in accordance with 40 CFR 96.13, as provided by 35 IAC 217.456(e) (1) (A). These certificates and documents must be retained on site at the source for at least 5-years after they are superseded because of the submission of a new account certificate of representation changing the account representative.
- b. All emissions monitoring information, in accordance with 40 CFR 96, Subpart H, (provided that to the extent that 40 CFR 96, Subpart H, provides for a 3-year period for retaining records, the 3-year period shall apply), pursuant to 35 IAC 217.456(e) (1) (B).
- c. Copies of all reports, compliance certifications, and other submissions and all records made or required under the NO_x Trading Program or documents necessary to demonstrate compliance with requirements of the NO_x Trading Program, pursuant to 35 IAC 217.456(e) (1) (C).
- d. Copies of all documents used to complete a budget permit application and any other submission under the NO_x Trading Program, pursuant to 35 IAC 217.456(e) (1) (D).

6.1.7 Reporting Requirements for Budget Units

- a. The account representative for this source and each budget unit at this source shall submit to the Illinois EPA and USEPA the reports and compliance certifications required under the NO_x Trading Program, including those under 40 CFR 96, Subparts D and H, and 35 IAC 217.474, pursuant to 35 IAC 217.456(e) (2).
- b. Notwithstanding the provisions for CAAPP permits, these submittals need only be signed by the designated representative, who may serve in place of the responsible official for this purpose, as provided by Section 39.5(1) of the Act, and submittals to the Illinois EPA need only be made to the Illinois EPA, Air Compliance Unit.

6.1.8 Allocation of NO_x Allowances to Budget Units

- a. As the budget units identified in Condition 6.1.2(a) are "existing" units listed in 35 IAC Part 217, Appendix E, these units are entitled to NO_x allowances as specified by Appendix E, subject to transfers of allowances from the source made in accordance with 35 IAC 217.462(b). (The portion of Appendix E that applies to the Permittee is provided in Condition 6.1.12.) The number of NO_x allowances actually allocated for these budget units shall be the number of NO_x allowances allocated by the Illinois EPA in accordance with 35 IAC 217.466(a) and issued by USEPA, which may reflect adjustments to the overall allocations to budget units as provided for by 35 IAC 217.460 and 217.462(c).
- b. To the extent that NO_x allowances remain in the NSSA after any allocation for new budget units, the Permittee is also entitled to a pro-rata share of such remaining allowances as provided by 35 IAC 217.466(d).

6.1.9 Eligibility to Obtain NO_x Allowances from the New Source Set-Aside (NSSA)

The Permittee is not eligible to obtain NO_x allowances from the NSSA for the budget units identified in Condition 6.1.2(a), as provided by 35 IAC 217.468, because the units are "existing" budget units.

6.1.10 Eligibility for Early Reduction Credits (ERC)

The Permittee is not eligible to request NO_x allowances for the budget units identified in Condition 6.1.2(a) for any early reductions in NO_x emissions prior to the 2004 control period, as provided by 35 IAC 217.470, because these units are not equipped with continuous emission monitoring systems for NO_x.

6.1.11 Budget Permit Required by the NO_x Trading Program

- a. For this source, this segment of the CAAPP Permit, i.e., Section 6.1, is the Budget Permit required by the NO_x Trading Program and is intended to contain federally enforceable conditions addressing all applicable NO_x Trading Program requirements. This Budget Permit shall be treated as a complete and segregable portion of the source's permit, as provided by 35 IAC 217.458(a) (2).
- b. The Permittee and any other owner or operator of this source and each budget unit at the source shall operate the budget units in compliance with this Budget Permit, pursuant to 35 IAC 217.456(b) (2).

- c. No provision of this Budget Permit or the associated application shall be construed as exempting or excluding the Permittee, or other owner or operator and, to the extent applicable, the account representative of a budget source or budget unit from compliance with any other regulation or requirement promulgated under the CAA, the Act, the approved State Implementation Plan, or other federally enforceable permit, pursuant to 35 IAC 217.456(g).
- d. Upon recordation by USEPA under 40 CFR 96, Subpart F or G, every allocation, transfer, or deduction of an allowance to or from the budget units' compliance accounts or to or from the source's general or overdraft account is deemed to amend automatically and become part of this budget permit, pursuant to 35 IAC 217.456(d) (7). This automatic amendment of this budget permit shall be deemed an operation of law and will not require any further review.
- e. No revision of this Budget Permit shall excuse any violation of the requirements of the NO_x Trading Program that occurs prior to the date that the revision to this permit takes effect, pursuant to 35 IAC 217.456(f) (1).
- f. The Permittee, or other owner or operator of the source, shall reapply for a Budget Permit for the source as required by 35 IAC Part 217, Subpart U and Section 39.5 of the Act. For purposes of the NO_x Trading Program, the application shall contain the information specified by 35 IAC 217.458(b) (2).

6.1.12 References

35 IAC Part 217 Appendix E - (provisions applicable to the Permittee)

Company ID No./Name	Unit Designation	Unit Description	Budget Allocation	Budget Allocation Less 3% NSSA
097811AAC Naval Training Center/Great Lakes	78080071011	Boiler #5	26	25
097811AAC Naval Training Center/Great Lakes	78080071011	Boiler #6	26	25
Company's Total Allocation			52	50

6.2 Emissions Reduction Market System (ERMS)

6.2.1 Description of ERMS

The ERMS is a "cap and trade" market system for major stationary sources located in the Chicago ozone nonattainment area. It is designed to reduce VOM emissions from stationary sources to contribute to reasonable further progress toward attainment, as required by Section 182(c) of the CAA.

The ERMS addresses VOM emissions during a seasonal allotment period from May 1 through September 30. Participating sources must hold "allotment trading units" (ATUs) for their actual seasonal VOM emissions. Each year participating sources are issued ATUs based on allotments set in the sources' CAAPP permits. These allotments are established from historical VOM emissions or "baseline emissions" lowered to provide the emissions reductions from stationary sources required for reasonable further progress.

By December 31 of each year, the end of the reconciliation period following the seasonal allotment period, each source shall have sufficient ATUs in its transaction account to cover its actual VOM emissions during the preceding season. A transaction account's balance as of December 31 will include any valid ATU transfer agreements entered into as of December 31 of the given year, provided such agreements are promptly submitted to the Illinois EPA for entry into the transaction account database. The Illinois EPA will then retire ATUs in sources' transaction accounts in amounts equivalent to their seasonal emissions. When a source does not appear to have sufficient ATUs in its transaction account, the Illinois EPA will issue a notice to the source to begin the process for Emissions Excursion Compensation.

In addition to receiving ATUs pursuant to their allotments, participating sources may also obtain ATUs from the market, including ATUs bought from other participating sources and general participants in the ERMS that hold ATUs (35 IAC 205.630) and ATUs issued by the Illinois EPA as a consequence of VOM emissions reductions from an Emissions Reduction Generator or an Intersector Transaction (35 IAC 205.500 and 35 IAC 205.510). During the reconciliation period, sources may also buy ATUs from a secondary reserve of ATUs managed by the Illinois EPA, the "Alternative Compliance Market Account" (ACMA) (35 IAC 205.710). Sources may also transfer or sell the ATUs that they hold to other sources or participants (35 IAC 205.630).

6.2.2 Applicability

This permit is issued based on this source not being a participating source in the Emissions Reduction Market System (ERMS), 35 IAC Part 205, pursuant to 35 IAC 205.200. This is based on the source's actual VOM emissions during the seasonal allotment period from May 1 through September 30 of each year being less than 10 tons and the source's baseline emissions also being less than 10 tons.

6.2.3 Recordkeeping and Reporting

- a. The Permittee shall maintain the following records to allow the confirmation of actual VOM emissions during the seasonal allotment period:
 - i. Records of operating data and other information for each individual emission unit or group of related emission units at the source, as specified in Sections 5 and 7 of this permit, as appropriate, to determine actual VOM emissions during the seasonal allotment period;
 - ii. Records of the VOM emissions, in tons, during the seasonal allotment period, with supporting calculations, for each individual emission unit or group of related emission units at the source, determined in accordance with the procedures specified in Sections 5 and 7 of this permit; and
 - iii. Total VOM emissions from the source, in tons, during each seasonal allotment period, which shall be compiled by November 30 of each year.
- b. In the event that the source's VOM emissions during the seasonal allotment period equal or exceed 10 tons, the source shall become a participating source in the ERMS and beginning with the following seasonal allotment period, shall comply with 35 IAC Part 205, by holding allotment trading units (ATUs) for its VOM emissions during each seasonal allotment period, unless the source obtains exemption from the ERMS by operating with seasonal VOM emissions of no more than 15 tons pursuant to a limitation applied for and established in its CAAPP permit.

7.0 UNIT SPECIFIC CONDITIONS

7.1 Unit 1: Boilers

7.1.1 Description

Twenty natural gas-fired/fuel oil #2 boilers supply steam, heat and power for the needs of this source

7.1.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date of Construction	Emission Control Equipment
Unit 1	20 Boilers (Total)		None
	11 FCEU - 4 (120 mmBtu/hr)	1952	
	11 FCEU - 5 (340 mmBtu/hr)	1966	
	11 FCEU - 6 (340 mmBtu/hr)	1966	
	1506 FCEU - 1 (2.5 mmBtu/hr)	N/A	
	1506 FCEU - 2 (2.5 mmBtu/hr)	N/A	
	2600 FCEU - 1 (2.9 mmBtu/hr)	1983	
	2600 FCEU - 2 (2.9 mmBtu/hr)	1983	
	2600 FCEU - 3 (2.9 mmBtu/hr)	1983	
	2711 FCEU - 1 (3.4 mmBtu/hr)	1989	
	2711 FCEU - 2 (3.4 mmBtu/hr)	1989	
	3000 FCEU - 1 (5.7 mmBtu/hr)	1992	
	3000 FCEU - 2 (5.7 mmBtu/hr)	1995	
	3211 FCEU - 1 (6.29 mmBtu/hr)	1995	
	3211 FCEU - 2 (4.42 mmBtu/hr)	1989	
	3217 FCEU - 1 (6.3 mmBtu/hr)	1989	
	3217 FCEU - 2 (6.3 mmBtu/hr)	1995	
	3400 FCEU - 1 (8.31 mmBtu/hr)	1995	
	3400 FCEU - 2 (8.31 mmBtu/hr)	1996	
	3511 FCEU - 1 (12.35.0 mmBtu/hr)	N/A	
	3511 FCEU - 2 (12.35.0 mmBtu/hr)	N/A	

7.1.3 Applicability Provisions and Applicable Regulations

- a. An "affected boiler" for the purpose of these unit specific conditions, is the boiler described in Conditions 7.1.1 and 7.1.2.
- b. Affected boilers with actual heat input greater than 2.9 MW (10 mmBtu/hr) are subject to 35 IAC 216.121. No person shall cause or allow the emission of carbon monoxide into the atmosphere from any fuel combustion emission source to exceed 200 ppm, corrected 50 percent excess air.
- c. All affected boilers are subject to the following limitation of 35 IAC 212.206:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period to exceed 0.15 kg of particulate matter per MW-hr of actual heat input from any fuel combustion emission unit using liquid fuel exclusively (0.10 lb/mmBtu).

- d. For affected boilers constructed prior to April 14, 1972 and burning liquid fuel, the following standard of 35 IAC 214.161 for sulfur dioxide is applied:

To exceed 0.46 kg of sulfur dioxide per MW-hr of actual heat when distillate fuel oil is burned (0.3 lb/mmBtu).

- e. No person shall cause or allow the emission of sulfur dioxide into the atmosphere in any one hour period from any fuel combustion emission source burning simultaneously any combination of solid, liquid and gaseous fuels to exceed the allowable emission rate determined by the following equation:

$$E = AX + BY + CZ$$

- i. Symbols in the equation mean the following:

E = Allowable sulfur dioxide emission rate;

A = Solid fuel sulfur dioxide emission standard which is applicable;

B = Distillate oil sulfur dioxide emission standard determined from the table in subsection (d);

C = Residual fuel oil sulfur dioxide emission standard which is applicable;

X = Actual heat input from solid fuel;

Y = Actual heat input from distillate fuel oil;

Z = Actual heat input from residual fuel oil;

- ii. That portion of the actual heat input that is derived:

A. From the burning of gaseous fuels produced by the gasification of solid fuels shall be included in X;

- B. From the burning of gaseous fuels produced by the gasification of distillate fuel oil shall be included in Y;
 - C. From the burning of gaseous fuels produced by the gasification of residual fuel oil shall be included in Z;
 - D. From the burning of gaseous fuels produced by the gasification of any other liquid fuel shall be included in Z; and,
 - E. From the burning of by-product gases such as those produced from a blast furnace or a catalyst regeneration unit in a petroleum refinery shall be included in Z.
- iii. Metric or English units may be used in the equation of subsection (a) as follows:

Parameter	Metric	English
E	Kg/hr	Lb/hr
A, C	Kg/MW-hr	Lb/mmBtu
B	0.46 kg/MW-hr	0.3 lb/mmBtu
X, X, Z	MW	mmBtu/hr

- e. For affected boilers constructed prior to April 14,1972, the opacity limit shall not exceed the following: No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to 35 IAC 212.122 [35 IAC 212.123(a)].
- f. For affected boilers constructed prior to April 14,1972, no person shall cause or allow the emission of nitrogen oxides into the atmosphere in any one hour period from any existing fuel combustion emission source with an actual heat input equal to or greater than 73.2 MW (250 mmBtu/hr), located in the Chicago major metropolitan area to exceed the following limitations, pursuant to 35 IAC 217.141:
 - i. For gaseous and/or liquid fossil fuel firing, 0.46 kg/MW-hr (0.3 lbs/mmBtu) of actual heat input;
 - ii. For fuel combustion emission sources burning simultaneously any combination of solid, liquid and gaseous fuel, the allowable emission rate shall be determined by the following equation:

$$E = (AG + BL + CS) Q$$

Where:

E = Allowable nitrogen oxides emissions

Q = Actual heat input

G = Percent of actual heat input derived from gaseous fossil fuel

L = Percent of actual heat input derived from liquid fossil fuel

S = Percent of actual heat input derived from solid fossil fuel

$$G + L + S = 100.0$$

and, where A, B, C and appropriate metric and English units are determined from the following table:

	Metric	English
E	Kg/hr	Lb/hr
Q	MW	mmBtu/hr
A	0.023	0.003
B	0.023	0.003
C	0.068	0.009

- g. Affected boilers 11 FCEU - 5 and 6 are subject to requirements of 35 IAC Part 217, Subpart U "NO_x Control and Trading Program For Specified NO_x Generating Units". Certain requirements of Subpart U are discussed in Subsection 6.2 "NO_x Trading Program".

7.1.4 Non-Applicability of Regulations of Concern

- a. Pursuant to 35 IAC 218.303, fuel combustion emission units are not subject to 35 IAC Part 218, Subpart G: Use of Organic Material.
- b. Affected boilers with a heat input capacity of less than 10 mmBtu/hr each are not subject to 35 IAC 216.121.
- c. Each affected boiler is not subject to 40 CFR Part 60, Subparts Da, Db, and Dc because such boiler was either being constructed before applicable dates established by these regulations or the heat input capacity of such affected boiler is lower than those thresholds established by these regulations.

- d. This permit is issued based on each affected boiler not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM), because the affected boiler does not use an add-on control device to achieve compliance with an emission limitation or standard.
- e. All affected boilers (except boilers 11 FCEU - 5 and 6) are not subject to requirements of 35 IAC Part 217, Subpart U "NO_x, Control and Trading Program For Specified NO_x Generating Units", because the maximum design heat input for any of these boilers is less than 250 mmBtu/hr.
- f. This permit is issued based on each affected boiler not being subject to 40 CFR 63 Subpart DDDDD, Industrial, Commercial, Institutional Boilers and Process Heater NESHAP, because the facility is not a major source of HAPs as based on the limits of Condition 5.5.2.

7.1.5 Operating Requirements and Work Practices

Each affected boiler shall only be operated with natural gas and/or fuel oil #2 as the fuel.

7.1.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Conditions 5.5.1 and 5.5.2, the affected boilers 3000 FCEU - 1 & 2, 3211 FCEU - 1 & 2, 3217 FCEU - 1 & 2, 3400 FCEU - 1 & 2, and 3451 FCEU - 1 shall not exceed the following emission limits:

- a. Emissions shall not exceed the following limits:

<u>Pollutant</u>	<u>Tons/Month</u>	<u>Tons/Year</u>
NO _x	2.25	23.75
CO	1.9	19.95
PM	0.17	1.8
VOM	0.12	1.3

- b. These limits are based on the maximum operating rate and standard emission factors established in AP-42. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).
- c. The above limitations are being established in this permit pursuant to Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21,

Prevention of Significant Deterioration (PSD). The source has requested that the Illinois EPA establish emission limitations and other appropriate terms and conditions in this permit that limit emissions from the affected boilers below the levels that would trigger the applicability of these rules, consistent with the information provided in the CAAPP application [T1N].

7.1.7 Testing Requirements

None

7.1.8 Monitoring Requirements

None

7.1.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for the affected boilers to demonstrate compliance with conditions of this permit, pursuant to Section 39.5(7)(b) of the Act:

- a. Total natural gas usage for all affected boilers with a heating capacity > 10 mmBtu/hr and < 100 mmBtu/hr each (mmscf/mo and mmscf/yr);
- b. Total natural gas usage for all affected boilers with a heating capacity more than 100 mmBtu/hr each (mmscf/mo and mmscf/yr);
- c. Total fuel oil #2 usage for all affected boilers (gal/mo and gal/yr);
- d. Sulfur content, wt.%, based on the fuel oil #2 supplier certification records or sampling and analysis from the storage tanks, in accordance with applicable ASTM methods; and
- e. Monthly and annual emissions of regulated air pollutants and HAPs as calculated in accordance with compliance procedures in Condition 7.1.12.

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the emission limitations as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

If there is an exceedance of the emission limitations in Conditions 5.5.1, 5.5.2, 7.1.3 and 7.1.6, as determined by the records required by this permit,

the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.1.12 Compliance Procedures

- a. Compliance with Condition 7.1.3 is assumed to be achieved by work-practices inherent in operation of affected boilers, so that no compliance procedures are set in the permit addressing this regulation.
- b. Compliance with the emission limits in Conditions 5.5.1 and 7.1.6 shall be based on the following emission factors (compliance for boilers < 10 mmBtu/hr each is assumed to be achieved by the inherent operations of such boilers and emissions may be calculated without actual natural gas usage):

i. Natural Gas Mode

A. Firing Rate < 100 mmBtu/hr

Pollutant	Emission Factor (lb/10 ⁶ scf)
NO _x	100
CO	84
VOM	5.5
PM	7.6

B. Firing Rate > 100 mmBtu/hr

Pollutant	Emission Factor (lb/10 ⁶ scf)
NO _x	158*
CO	84
VOM	5.5
PM	7.6

* Stack test data

These are the emission factors for uncontrolled natural gas combustion in large boilers (> 100 mmBtu/hr), Tables 1.4-1 and 1.4-2, AP-42, March 1998.

ii. Fuel Oil #2 Mode

A. Firing Rate < 100 mmBtu/hr

Pollutant	Emission Factor (lb/1000 gal)
NO _x	20
SO ₂	142S**
CO	5
VOM	0.216
PM	3.3

B. Firing Rate > 100 mmBtu/hr

Pollutant	Emission Factor (lb/1000 gal)
NO _x	51*
SO ₂	157S**
CO	5
VOM	0.2
PM	3.3

* Stack test data

These are the emission factors for fuel oil #2, Table 1.3-1, AP-42, September 1998.

**"S" indicates that the weight % of sulfur in the oil should be multiplied by the value given.

c. HAP Emissions:

For purposes of complying with HAP emission limits established in Condition 5.5.2, calculations of HAP emissions from affected boilers shall be based on the following emission factors or other factors as approved by the Illinois EPA and established in this permit:

i. Natural Gas Mode

Individual HAP	Emission Factor (lb/10 ⁶ scf)
Benzene	0.0021
Formaldehyde	0.075
Hexane	1.8
Naphthalene	0.00061
Toluene	0.0034

These are the emission factors for speciated organic compounds from natural gas combustion, Table 1.4-3, AP-42, July 1998.

ii. Fuel Oil #2 Mode

Individual HAP	Emission Factor (lb/1000 gal)
Benzene	0.000214
Formaldehyde	0.033
Naphthalene	0.0013
Toluene	0.0062

These are the emission factors for residual oil fired boilers, Table 1.3-9, AP-42, September 1998.

7.2 Unit 2: Engines and Turbines

7.2.1 Description

Engines and Turbines are used to produce power for facility needs and for training purposes.

7.2.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Unit 2	<p style="text-align: center;"><u>Engines</u></p> <p style="text-align: center;">238-ICE-1 Through 6; 239-ICE-1 & 2; 6224-ICE-1 & 2; 329-ICE-1 Through 4 & 7; 325-ICE 8 & 9; 3209-ICE 2 & 3; 11-ICE-3</p> <p style="text-align: center;"><u>Turbines</u></p> <p style="text-align: center;">Four Propulsion Turbines (GL-7A, GL-7B, GL-47C, and GL-47D, Building 325) Two Generator Turbines (GL-47A and GL-47B, Building 325) Two Generator Turbines (GTG1 and GTG2, Building 6224)</p>	<p style="text-align: center;">None None None None None None None None None None</p>

7.2.3 Applicability Provisions and Applicable Regulations

- a. An "affected engine and/turbine " for the purpose of these unit specific conditions, is the unit described in Conditions 7.2.1 and 7.2.2.
- b. The emission of VOM into the atmosphere shall not exceed 3.6 kg/hour (8 lb/hour) from an affected turbine, except as provided in 35 IAC 218.302, 218.303, or 218.304 and the following exemption: If no odor nuisance exists the limitation of 35 IAC 218 Subpart G shall only apply to photochemically reactive material [35 IAC 218.301].
- c. i. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to 35 IAC 212.122.

- ii. The emission of smoke or other particulate matter from any such emission unit may have an opacity greater than 30 percent but not greater than 60 percent for a period or periods aggregating 8 minutes in any 60 minutes period, provided that such opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 305 m (1000 ft) radius from the center point of any other such emission unit owned or operated by such person, and provided further that such emission unit shall be limited to 3 times in any 24 hours [35 IAC 212.123].
- d. No person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to exceed 2000 ppm [35 IAC 214.301].
- e. The affected turbines are subject to the one of the following emission standards for sulfur dioxide established in 40 CFR Part 60, Subpart GG "Standards of Performance for Stationary Gas Turbines":
 - i. No owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere from any stationary gas turbine any gases which contain sulfur dioxide in excess of 0.015 percent by volume at 15 percent oxygen and on a dry basis; or
 - ii. No owner or operator subject to the provisions of this subpart shall burn in any stationary gas turbine any fuel which contains sulfur in excess of 0.8 percent by weight.

7.2.4 Non-Applicability of Regulations of Concern

- a. The affected engines and turbines are not subject to the following requirements:
 - i. The affected engines/turbines are not subject to 35 Ill. Adm. Code 216.121, emissions of carbon monoxide from fuel combustion emission units, because the affected engines/turbines are not by definition fuel combustion emission units.
 - ii. The affected engines/turbines are not subject to 35 Ill. Adm. Code 217.121, emissions of nitrogen oxides from new fuel combustion emission sources, because the actual heat input of each unit is less than 73.2 MW (250 mmBtu/hr) and the affected engines/turbines are not by definition fuel combustion emission units.

- iii. This permit is issued based on the affected engines/turbines not being subject to 35 Ill. Adm. Code 212.321 because due to the unique nature of this processes, such rules cannot reasonably be applied.
- b. The affected turbines are used as a military training facility and not subject to standards for nitrogen oxides established in the 40 CFR 60.332(a), pursuant to 40 CFR 60.322(g).
- c. This permit is issued based on the affected engines/turbines not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM), because the affected turbines do not use an add-on control device to achieve compliance with an emission limitation or standard.
- d. This permit is issued based on each affected engine not being subject to 40 CFR 63 Subpart ZZZZ, Reciprocating Internal Combustion Turbine NESHAP because the facility is not a major source of HAPs as based on the limits of Condition 5.5.2.
- e. This permit is issued based on each affected turbine not being subject to 40 CFR 63 Subpart YYYY, Stationary Combustion Turbine NESHAP because the facility is not a major source of HAPs as based on the limits of Condition 5.5.2.

7.2.5 Operating Requirements and Work Practices

Each affected engines/turbines shall only be operated with No. 2 distillate fuel oil (diesel) as the fuel.

7.2.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Conditions 5.5.1 and 5.5.2, all affected turbines are limited to the following:

- a. Turbines for ship simulators (two generator turbines GL-47A and GL-47B; four propulsion turbines: GL-7A; GL-7B; GL-47C; and GL-47D):
 - i. Two generator turbines (GL-47A and GL-47B) shall not operate for more than 960 hours/year per set.
 - ii. Four propulsion turbines (GL-7A; GL-7B; GL-47C; and GL-47D) shall not operate for more than 1,920 hours/year per set (two in a set) of turbines.

iii. Emissions from propulsion turbines GL-7A, GL-7B, GL-47C, and GL-47D shall not exceed the following limits:

A. Hourly emissions, lb/hr

Unit	PM	SO ₂	NO _x	VOM	CO
GL-7A&B	2.3	12.6	16.3	17.8	86.4
GL-47C&D	2.3	12.6	16.3	17.8	86.4

B. Annual emissions, t/yr

Unit	PM	SO ₂	NO _x	VOM	CO
GL-7A&B	1.08	5.91	7.64	8.35	40.52
GL-47C&D	1.08	5.91	7.64	8.35	40.52

iv. Emissions from generator turbines GL-47A and GL-47B shall not exceed the following limits:

A. Hourly emissions, lb/hr

Unit	PM	SO ₂	NO _x	VOM	CO
GL-47A&B	1.6	9.8	13.0	1.4	16.0

B. Annual emissions, t/yr

Unit	PM	SO ₂	NO _x	VOM	CO
GL-47A&B	1.99	12.22	16.21	1.75	19.95

The above limitations contain revisions to previously issued Permit 89110050. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of this aforementioned permit, consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance of Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification and 40 CFR 52.21. These limits continue to ensure that the construction and/or modification addressed in this permit does not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, the hours of operation for turbines and annual emissions from turbines have been decreased based on the applicability of more precise emission factor for dispensing operation [T1R].

b. Two turbines (GTG1 and GTG2, Building 6224)

i. The Permittee shall not operate each turbine and associated engine more than 300 hours per year.

ii. GTG1

<u>Pollutant</u>	<u>(Lb/Hour)</u>	<u>(Tons/Year)</u>
NO _x	48.80	7.32
CO	25.03	3.75
VOM	7.45	1.11
SO ₂	12.36	1.85

iii. GTG2

<u>Pollutant</u>	<u>(Lb/Hour)</u>	<u>(Tons/Year)</u>
NO _x	38.20	5.73
CO	3.19	0.48
VOM	0.95	0.14
SO ₂	12.36	1.85

The above limitations were established in Permit 00100015, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).

c. For engines (238-ICE-1 through 4, 238-ICE-6, 239-ICE-1, 239-ICE-2, 329-ICE-1 through 4 and 329-ICE-7, 325-ICE-8, 325-ICE-9, and 11-ICE-3), the Permittee shall not operate each affected engine more than 4,000 hours per year.

7.2.7 Testing Requirements

For gas turbines, the owner or operator shall determine compliance with the sulfur content standard in 40 CFR 60.333(b) by using ASTM D 2880-71, 78, or 96 (for liquid fuels), pursuant to 40 CFR 60.335(d).

7.2.8 Monitoring Requirements

The owner or operator of any stationary gas turbine subject to the provisions of this subpart shall monitor sulfur content of the fuel being fired in the turbine. The frequency of determination of these values shall be as follows:

- a. If the turbine is supplied its fuel from a bulk storage tank, the values shall be determined on each occasion that fuel is transferred to the storage tank from any other source or prior to transferring to the day tanks that supply these turbines. Sampling and analysis will be done in accordance with applicable ASTM methods.
- b. If the turbine is supplied its fuel without intermediate bulk storage the values shall be determined and recorded daily. Owners, operators or fuel vendors may develop custom schedules for determination of the values based on the design and operation of the affected facility and the characteristics of the fuel supply. These custom schedules shall be substantiated with data and must be approved by the Illinois EPA before they can be used to comply with 40 CFR 60.334(b).

7.2.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for the affected engines/turbines to demonstrate compliance with conditions of this permit, pursuant to Section 39.5(7)(b) of the Act:

- a. The operating parameters of the turbines, as related by emissions;
- b. The amount of diesel fuel used per month (gal);
- c. Sulfur content in the fuel oil, %;
- d. Hours of operation for each affected turbine and engine; and
- e. Monthly and annual emissions of regulated air pollutants and HAPs as calculated in accordance with compliance procedures in Condition 7.2.12.

7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the affected engines/turbines with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

If there is an exceedance of the emission limitations In Conditions 5.5.2, 7.2.3 and 7.2.6, as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.2.12 Compliance Procedures

- a. Compliance with Condition 7.2.3(b) and (c) is assumed to be achieved by work-practices inherent in operation of affected engines/turbines, so that no compliance procedures are set in the permit addressing this regulation.
- b. Compliance with the emission limits in Conditions 5.5.1 and 7.2.6 shall be based on the following emission factors:
 - i. Turbines (Buildings 325 and 6224)

Unit	NO _x Lb/10 ³ gal	CO Lb/10 ³ gal	VOM Lb/10 ³ gal	PM ₁₀ Lb/10 ³ gal	SO ₂ Lb/10 ³ gal
GTG1*, Bldg. 6224	148	76.1	22.7	13.8	37.6
GTG2*, Bldg. 6224	116	9.70	2.89	1.95	37.6
Bldg.325** GL-7A/GL-7B GL-47C/ GL-47D	Specified below per speed range	Specified below per speed range	Specified below per speed range	Specified below per speed range	Specified below per speed range
5-15 knots	24	131	6.8	1.6	19
16-24 knots	35	28	1.1	2.7	18
25-29 knots	53	5.5	0.15	3.1	17
30 knots	60	1.6	0.11	2.9	17
Bldg.325*** GL-47A/ GL-47B	50.5	62.1	5.43	6.21	38.0

* November 22, 2000 test conducted by Rolls-Royce Corporation under full load conditions

** August 18, 1995 performance schedule and rating memorandum

*** Emissions based on full load (35.9 mmBtu/hr) and HHV of 139,000 Btu/gal

ii. Engines (< 600 hp)

Pollutants	Emission Factors, lb/hp-hr
NO _x	0.031
CO	0.00668
PM	0.0022
SO ₂	0.00205
VOM	0.00247

These are the emission factors for diesel industrial engines, Table 3.3-1 of AP-42, October 1996.

iii. Engines (> 600 hp)

Pollutants	Emission Factors, lb/hp-hr
NO _x	0.024
CO	0.0055
PM	0.0007
SO ₂	0.00809"S"
VOM	0.000705

"S" Sulfur content in the fuel oil, %

These are the emission factors for diesel industrial engines, Table 3.4-1 of AP-42, October 1996.

c. HAP Emissions:

For purposes of complying with HAP emission limits established in Condition 5.5.2, calculations of HAP emissions from affected engines/turbines shall be based on the following emission factors or other factors as approved by the Illinois EPA and established in this permit:

i. Engines (< 600 hp)

Individual HAP	Emission Factors, lb/mmBtu
Benzene	0.000933
Toluene	0.000409
Propylene	0.00258
Formaldehyde	0.00118

These are the emission factors for diesel industrial engines, Table 3.3-2 of AP-42, October 1996.

ii. Engines (>600 hp)

Individual HAP	Emission Factors, lb/mmBtu
Benzene	0.000776
Toluene	0.000281
Propylene	0.00279
Formaldehyde	0.0000789

These are the emission factors for diesel industrial engines, Table 3.4-3 of AP-42, October 1996.

iii. Turbines

Individual HAP	Emission Factors, lb/mmBtu
Benzene	0.000055
Naphthalene	0.000035
Formaldehyde	0.00028

These are the emission factors for distillate oil-fired gas turbines, Table 3.1-4 of AP-42, April 2000.

7.3 Unit 3: Gasoline Storage Tank and Dispensing Operations

7.3.1 Description

The gasoline storage tanks are associated with gasoline non-retail dispensing operations for the vehicles at the source.

7.3.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Equipment	Description	Emission Control Equipment
Unit 3	Gasoline Storage Tanks and Dispensing Operations	Building 13 (1 Tank) Building 1506/1507* (2 Tanks) Building 2710* (3 Tanks) Building 929 (1 Tank) Building 400* (2 Tanks)	Stage I and Stage II Vapor Recovery Systems for Tanks Marked With *

7.3.3 Applicability Provisions and Applicable Regulations

- a. An affected "gasoline storage tank" for the purpose of these unit specific conditions is used for gasoline storage and non-retail dispensing of the source's vehicles with an average monthly throughput exceeding 10,000 gallons.
- b. The affected gasoline storage tanks in Buildings 1506/1507, 400, and 2710 are subject to 35 IAC 218.583(a), (c) & (d). These requirements are discussed further in Condition 7.3.5.
- c. The operations associated with dispensing operations at this location in Buildings 1506/1507, 400, and 2710 are subject to 35 IAC 218.586(c), (d), (e), (g). These requirements are discussed further in this subsection.
- d. The affected gasoline storage tanks in Buildings 13 and 929 are subject to 35 IAC 218.122(b). These requirements are discussed further in Condition 7.3.5.

7.3.4 Non-Applicability of Regulations of Concern

- a. The gasoline dispensing operations operated on the site of the Naval Training Center are not subject to the exemption from the permit requirements as established by 35 IAC 201.146 (kk) and 35 IAC 218.586(h). These exemptions are applied to the state permits only and not applicable for the federally enforceable permits under the CAA Permit Program.

- b. The gasoline tanks in Buildings 13 and 929 are not used for motor vehicle dispensing operations. Therefore, requirements of 35 IAC 218.583 and 218.586 are not applicable to these tanks.
- c. This permit is issued based on the affected gasoline storage tank not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected gasoline storage tank does not have potential pre-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.

7.3.5 Operational and Production Limits, and Work Practices

- a. No person shall cause or allow the loading of any organic material in any stationary tank having a storage capacity of greater than 946 l (250 gal), unless such tank is equipped with a permanent submerged loading pipe [35 IAC 218.122(b)].
- b. No person shall cause or allow the transfer of gasoline from any delivery vessel into the stationary storage tank at a gasoline dispensing operations unless [35 IAC 218.583(a)]:
 - i. The tank is equipped with a submerged loading pipe; and
 - ii. The vapors displaced from the storage tank during filling and processed by a vapor control system that includes one or more of the following:
 - A. A vapor collection system that meets the requirements of 218.583(d)(4); or
 - B. A refrigeration-condensation system or any other system approved by the Illinois EPA and approved by the USEPA as a SIP revision, that recovers at least 90 percent by weight of all vaporized organic material from the equipment being controlled; and
 - C. The delivery vessel displays the appropriate sticker pursuant to the requirements of Section 218.584(b) or (d).

- iii. All tank vent pipes are equipped with pressure/vacuum relief valves and shall be set to resist a pressure of at least 3.5 inches water column and to resist a vacuum of no less than 6.0 inches water column.
- c. Each owner of a gasoline dispensing operation shall [35 IAC 218.583(c)]:
- i. Install all control systems and make all process modifications required by 35 IAC 218.583(a);
 - ii. Provide instructions to the operator of the gasoline dispensing operation describing necessary maintenance operations and procedures for prompt notification of the owner in case of any malfunction of a vapor control system; and
 - iii. Repair, replace or modify any worn out or malfunctioning component or element of design.
- d. Each operator of a gasoline dispensing operation shall [35 IAC 218.583(d)]:
- i. Maintain and operate each vapor control system in accordance with the owner's instructions;
 - ii. Promptly notify the owner of any scheduled maintenance or malfunction requiring replacement or repair of a major component of a vapor control system;
 - iii. Maintain gauges, meters or other specified testing devices in proper working order;
 - iv. Operate the vapor collection system and delivery vessel unloading points in a manner that prevents:
 - A. A reading equal to or greater than 100 percent of the lower explosive limit (LEL measured as propane) when tested in accordance with the procedure described in EPA 450/2-78-051 Appendix B incorporated by reference in Section 218.112 of this Part; and
 - B. Avoidable leaks of liquid during the filling of storage tanks.

- v. Within 15 business days after discovery of the leak by the owner, operator, or the Illinois EPA, repair and retest a vapor collection system which exceeds the limits of Condition 7.3.5(d) (iv) (A) .
- e. No owner or operator of a gasoline dispensing operation subject to the requirements of 35 IAC 218.586(b) shall cause or allow the dispensing of motor vehicle fuel at any time from a motor fuel dispenser unless the dispenser is equipped with and utilizes a vapor collection and control system which is properly installed and operated as provided below:
 - i. Any vapor collection and control system installed, used or maintained has been CARB certified.
 - ii. Any vapor collection and control system utilized is maintained in accordance with the manufacturer's specifications and the certification.
 - iii. No elements or components of a vapor collection and control system are modified, removed, replaced or otherwise rendered inoperative in a manner which prevents the system from performing in accordance with its certification and design specifications.
 - iv. A vapor collection and control system has no defective, malfunctioning or missing components.
 - v. Operators and employees of the gasoline dispensing operation are trained and instructed in the proper operation and maintenance of a vapor collection and control system.
 - vi. Instructions are posted in a conspicuous and visible place within the motor fuel dispensing area and describe the proper method of dispensing motor vehicle fuel with the use of the vapor collection and control system [35 IAC 218.586 (c)].

7.3.6 Emission Limitations

In addition to the source wide emission limitations in Conditions 5.5.1 and 5.5.2 the affected gasoline storage tanks and dispensing operations are subject to the following:

a. Building 400

Gasoline Throughput		Emission	VOM Emissions	
(gal/mo)	(gal/yr)	Factor* (lb/1,000 gal)	(T/mo)	(T/yr)
325,000	3,900,000	3.1	0.5	6.0

The above limitations contain revisions to previously issued Permit 00100015. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of this aforementioned permit, consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance of Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification. These limits continue to ensure that the construction and/or modification addressed in this permit does not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, annual VOM emissions have been decreased based on the applicability of more precise emission factor for dispensing operation [T1R].

b. Building 1506/1507

Gasoline Throughput		Emission	VOM Emissions	
(gal/mo)	(gal/yr)	Factor* (lb/1,000 gal)	(lb/mo)	(T/yr)
30,000	360,000	3.1	93	0.56

The above limitations contain revisions to previously issued Permit 97020010. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of this aforementioned permit, consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance of Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification. These limits continue to ensure that the construction and/or modification addressed in this permit does not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and

activities permitted in this permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, annual VOM emissions have been decreased based on the applicability of more precise emission factor for dispensing operation [T1R].

* This emission factor is a sum of the following emission factors for gasoline service station operations equipped with Stage II vapor control system (Table 5.2.7, AP-42):

- Balanced Submerged Filling - 0.3 lb/1,000 gal;
- Breathing and Emptying - 1.0 lb/1,000 gal;
- Displacement Losses (Controlled) - 1.1 lb/1,000 gal; and
- Spillage - 0.7 lb/1,000 gal.

7.3.7 Testing Requirements

Pursuant to 35 IAC 218.583(a) (4), the Permittee shall demonstrate compliance with subsection 218.583(a) (3) after installation of each pressure/vacuum relief valve, and at least annually thereafter, by measuring and recording the pressure indicated by a pressure/vacuum gauge at each tank vent pipe. The test shall be performed on each tank vent pipe within two hours after product delivery into the respective storage tank. For manifold tank vent systems, observations at any point within the system shall be adequate. The Permittee shall maintain any records required by this subsection for a period of five years.

7.3.8 Monitoring Requirements

None

7.3.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the storage tank to demonstrate compliance with Condition 5.5.1, 5.5.2 and Condition 7.3.4(a) pursuant to Section 39.5(7) (b) of the Act, 35 IAC 218.129(f), and 35 IAC 218.586 (g) and (h):

- a. Any gasoline dispensing operation subject to 35 IAC 218.586(c) shall retain at the operation copies of the registration information required at 35 IAC 218.586(h).

- b. Records and reports shall be made available to the Illinois EPA upon request. Records and reports, which shall be maintained by the owner or operator of the gasoline dispensing operations shall clearly demonstrate:
 - i. That a certified vapor collection and control system has been installed and tested to verify its performance according to its specifications.
 - ii. That proper maintenance has been conducted in accordance with the manufacturer's specifications and requirements.
 - iii. The time period and duration of all malfunctions of the vapor collection and control system.
 - iv. The motor vehicle fuel throughput of the operation for each calendar month of the previous year.
 - v. That operators and employees are trained and instructed in the proper operation and maintenance of the vapor collection and control system and informed as to the potential penalties associated with the violation of any provision of 35 IAC 218.586.
- c. A copy of the registration information is maintained at the gasoline dispensing operation.
- d. Readily accessible records of dimensions and analysis of the capacity of each storage tank and test results.
- e. Monthly and annual gasoline throughput (gallons/month and gallons/year).
- f. Annual vendor records of HAP content composition (% by weight) of gasoline stored/dispensed at the storage tanks identified in 7.3.2.
- g. Total monthly and annual emissions of VOM and HAP calculated based on the compliance procedures in Condition 7.3.12.

7.3.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the control and operating requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

Upon the modification of an existing vapor collection and control system, the owner or operator of the gasoline dispensing operation submits to the Illinois EPA a registration that details the changes to the information provided in the previous registration of the vapor collection and control system and which includes the signature of the owner or operator. The registration must be submitted to the Illinois EPA within 30 days of completion of such modification [35 IAC 218.586(h)(4)].

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.3.12 Compliance Procedures

- a. To determine compliance with Conditions 5.5.1 and 7.3.6, VOM emissions from the storage tank(s)-motor vehicle dispensing operations shall be calculated based on the following equation and standard emission factor for a Stage II vapor control systems established in AP-42, Table 5.2-7, Evaporative Emissions from Gasoline Service Station Operations:

Emissions (lb) = Gasoline Throughput (gal) x 3.1 lb/1,000 gal Throughput

- b. VOM emissions from the storage tank not being involved into motor vehicle dispensing activities shall be calculated based on the most recent version of the TANKS program.

- c. HAP Emissions:

For purposes of complying with HAP emission limits established in Condition 5.5.2, calculations of HAP emissions from affected gasoline storage tanks shall be based on the annual vendor records of HAP content composition (% by weight). Then, equation in Condition 7.3.12(a) above shall be corrected accordingly to calculate HAP emissions.

7.4 Unit 4: Perchloroethylene Dry Cleaning Units

7.4.1 Description

Dry-to-dry machines (9 units) are utilized at this source.

7.4.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Equipment	Description	Emission Control Equipment
Unit 4	Nine Machines	Perchloroethylene Dry Cleaning Machines	In-Build Condenser

7.4.3 Applicability Provisions and Applicable Regulations

- a. An "affected dry cleaning unit" for the purpose of these unit specific conditions, is the dry-to-dry machine described in Conditions 7.4.1 and 7.4.2.
- b. An affected dry cleaning unit is subject to 40 CFR Par 63, Subpart M "National Perchloroethylene Air Emission Standards for Dry Cleaning Facilities". The requirements of this subpart are discussed further in this section.
- c. An affected dry cleaning unit is subject to requirements of 35 IAC 218.601.

7.4.4 Non-Applicability of Regulations of Concern

This permit is issued based on the affected dry cleaning units not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM), because the affected dry cleaning units are subject to a NESHAP proposed after November 15, 1990, pursuant to 40 CFR 64.2(b)(1)(i).

7.4.5 Operating Requirements and Work Practices

- a. The owner or operator of each new dry-to-dry machine and its ancillary equipment installed after September 22, 1993 [40 CFR 63.322(b)]:
 - i. Shall route the air-perchloroethylene gas-vapor stream contained within each dry cleaning machine through a refrigerated condenser or an equivalent control device; and
 - ii. Shall pass the air-perchloroethylene gas-vapor stream from inside the dry cleaning machine drum through a carbon adsorber or equivalent control device immediately before or as the door of the dry cleaning machine is opened if the dry cleaning machine is located at a major source.

- b. The owner or operator shall close the door of each dry cleaning machine immediately after transferring articles to or from the machine, and shall keep the door closed at all other times [40 CFR 63.323(c)].
- c. The owner or operator of each dry cleaning system shall operate and maintain the system according to the manufacturers' specifications and recommendations [40 CFR 63.323(d)].
- d. Each refrigerated condenser installed on a dry-to-dry machine [40 CFR 63.322(e)]:
 - i. Shall be operated to not vent or release the air-perchloroethylene gas-vapor stream contained within the dry cleaning machine to the atmosphere while the dry cleaning machine drum is rotating;
 - ii. Shall be monitored according to 40 CFR 63.323(a)(1); and
 - iii. Shall be operated with a diverter valve, which prevents air drawn into the dry cleaning machine when the door of the machine is open from passing through the refrigerated condenser.
- e. The owner or operator of a dry cleaning system shall inspect the following components weekly for perceptible leaks while the dry cleaning system is operating [40 CFR 63.322(k)]:
 - i. Hose and pipe connections, fittings, couplings, and valves;
 - ii. Door gaskets and seatings;
 - iii. Filter gaskets and seatings
 - iv. Pumps;
 - v. Solvent tanks and containers;
 - vi. Water separators;
 - vii. Muck cookers;
 - viii. Stills;
 - ix. Exhaust dampers;
 - x. Diverter valves; and

xi. Cartridge filter housings.

- f. The owner or operator of a dry cleaning system shall repair all perceptible leaks detected under 40 CFR 63.322(k) within 24 hours. If repair parts must be ordered, either a written or verbal order for those parts shall be initiated within 2 working days of detecting such a leak. Such repair parts shall be installed within 5 working days after receipt.
- g. The total perchloroethylene usage shall not exceed 1,300 gallons/year on a rolling 12-month basis.

7.4.6 Emission Limitations

In addition to Condition 5.2.2, the source wide limitations in Conditions 5.5.1 and 5.5.2, and limitations in Condition 7.4.3 the affected dry cleaning unit is subject to the following:

Total production and emissions from the affected dry cleaning units shall not exceed the following limits

Perchloroethylene Usage (gal/yr)	HAP Emissions (Ton/yr)
1,300	8.85

This production and emission limitations are based on the perchloroethylene density equal to 13.61 lb/gal.

These limitations have been created as a part of establishing this facility as a non-major source of HAP emissions.

Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total)

7.4.7 Testing Requirements

None

7.4.8 Monitoring Requirements

The measurement requirements for a refrigerated condenser [40 CFR 63.623(a)]:

- a. The owner or operator shall measure the temperature of the air-perchloroethylene gas-vapor stream on the outlet side of the refrigerated condenser on a dry-to-dry machine, dryer, or reclaimer weekly with a temperature sensor to determine if it is equal to or less than 7.2°C (45°F). The temperature sensor shall be used according to the manufacturer's instructions and shall be designed to measure a temperature of 7.2°C (45°F) to an accuracy of ± 1.1°C (± 2°F).

- b. The owner or operator shall calculate the difference between the temperature of the air-perchloroethylene gas-vapor stream entering the refrigerated condenser on a washer and the temperature of the air-perchloroethylene gas-vapor stream exiting the refrigerated condenser on the washer weekly to determine that the difference is greater than or equal to 11.1°C (20°F).
 - i. Measurements of the inlet and outlet streams shall be made with a temperature sensor. Each temperature sensor shall be used according to the manufacturer's instructions, and designed to measure at least a temperature range from 0°C (32°F) to 48.9°C (120°F) to an accuracy of $\pm 1.1^\circ\text{C}$ ($\pm 2^\circ\text{F}$).
 - ii. The difference between the inlet and outlet temperatures shall be calculated weekly from the measured values.

7.4.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain the following records for affected dry cleaning unit to demonstrate compliance with Conditions 5.5.1, 5.5.2 and 7.4.5, pursuant to Section 39.5(7)(b) of the Act:

Each owner or operator of a dry cleaning facility shall keep receipts of perchloroethylene purchases and a log of the following information and maintain such information on site and show it upon request for a period of 5 years:

- a. The volume of perchloroethylene purchased each month by the dry cleaning facility as recorded from perchloroethylene purchases; if no perchloroethylene is purchased during a given month then the owner or operator would enter zero gallons into the log;
- b. The calculation and result of the yearly perchloroethylene consumption determined on the first day of each month as specified in 40 CFR 63.323(d);
- c. The dates when the dry cleaning system components are inspected for perceptible leaks, as specified in 40 CFR 63.322(k) or (l), and the name or location of dry cleaning system components where perceptible leaks are detected;
- d. The dates of repair and records of written or verbal orders for repair parts to demonstrate compliance with 40 CFR 63.322(m) and (n);

- e. The date and temperature sensor monitoring results, if a refrigerated condenser is used to comply with 40 CFR 63.322(a) or (b);
- f. Each owner or operator of a dry cleaning facility shall retain onsite a copy of the design specifications and the operating manuals for each dry cleaning system and each emission control device located at the dry cleaning facility;
- g. Annual amount of off-site shipped solvent waste (gal/yr) and density of this waste; and
- h. Emissions calculated based on the compliance procedure in Condition 7.4.12.

7.4.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with any applicable requirements of this permit as follows pursuant to Section 39.5(7) (f) (ii) of the Act:

Within 30 days for each occurrence when the affected dry cleaning unit was not operated in compliance with requirements of Condition 7.4.5, with date, description and explanation.

7.4.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.4.12 Compliance Procedures

- a. Compliance with Condition 7.4.3 by affected dry cleaning unit is assumed to be achieved by compliance with operating requirements and work-practices specified by Condition 7.4.5.
- b. Emissions of VOM and HAP (perchloroethylene) shall be calculated based on the following:

$$\text{Emissions} = [\text{Perchloroethylene Usage (gal)} \times \text{Density (lb/gal)}] - [\text{Shipped Off-site Solvent Waste (gal)} \times \text{Density (lb/gal)}]$$

8.0 GENERAL PERMIT CONDITIONS

8.1 Permit Shield

Pursuant to Section 39.5(7)(j) of the Act, the Permittee has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements which were applicable as of the date the proposed permit for this source was issued, provided that either the applicable requirements are specifically identified within this permit, or the Illinois EPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to this source and this determination (or a concise summary thereof) is included in this permit.

This permit shield does not extend to applicable requirements which are promulgated after September 25, 2002 (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

This source is not an affected source under Title IV of the CAA and is not subject to requirements pursuant to Title IV of the CAA.

8.3 Emissions Trading Programs

No permit revision shall be required for increases in emissions allowed under any USEPA approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for elsewhere in this permit and that are authorized by the applicable requirement [Section 39.5(7)(o)(vii) of the Act].

As of the date of issuance of this permit, there are no such economic incentive, marketable permit or emission trading programs that have been approved by USEPA.

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

Physical or operational changes specifically addressed by the Conditions of this permit that have been identified as not requiring Illinois EPA notification may be implemented without prior notice to the Illinois EPA.

8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes that contravene express permit terms without applying for or obtaining an amendment to this permit, provided that [Section 39.5(12)(a)(i) of the Act]:

- a. The changes do not violate applicable requirements;
- b. The changes do not contravene federally enforceable permit terms or conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements;
- c. The changes do not constitute a modification under Title I of the CAA;
- d. Emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change; and
- e. The Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change. This notice shall:
 - i. Describe the physical or operational change;
 - ii. Identify the schedule for implementing the physical or operational change;
 - iii. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;
 - iv. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and
 - v. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

8.5 Testing Procedures

Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the Illinois EPA shall be submitted as specified in Condition 8.6.

8.6 Reporting Requirements

8.6.1 Monitoring Reports

If monitoring is required by any applicable requirements or conditions of this permit, a report summarizing the required monitoring results, as specified in the conditions of this permit, shall be submitted to the Air Compliance Section of the Illinois EPA every six months as follows [Section 39.5(7)(f) of the Act]:

<u>Monitoring Period</u>	<u>Report Due Date</u>
January - June	September 1
July - December	March 1

All instances of deviations from permit requirements must be clearly identified in such reports. All such reports shall be certified in accordance with Condition 9.9.

8.6.2 Test Notifications

Unless otherwise specified elsewhere in this permit, a written test plan for any test required by this permit shall be submitted to the Illinois EPA for review at least 60 days prior to the testing pursuant to Section 39.5(7)(a) of the Act. The notification shall include at a minimum:

- a. The name and identification of the affected unit(s);
- b. The person(s) who will be performing sampling and analysis and their experience with similar tests;
- c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;
- d. The specific determination of emissions and operation which are intended to be made, including sampling and monitoring locations;
- e. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods;
- f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and

- g. Any proposed use of an alternative test method, with detailed justification.

8.6.3 Test Reports

Unless otherwise specified elsewhere in this permit, the results of any test required by this permit shall be submitted to the Illinois EPA within 60 days of completion of the testing. The test report shall include at a minimum [Section 39.5(7)(e)(i) of the Act]:

- a. The name and identification of the affected unit(s);
- b. The date and time of the sampling or measurements;
- c. The date any analyses were performed;
- d. The name of the company that performed the tests and/or analyses;
- e. The test and analytical methodologies used;
- f. The results of the tests including raw data, and/or analyses including sample calculations;
- g. The operating conditions at the time of the sampling or measurements; and
- h. The name of any relevant observers present including the testing company's representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.

8.6.4 Reporting Addresses

- a. The following addresses should be utilized for the submittal of reports, notifications, and renewals:

- i. Illinois EPA - Air Compliance Section

Illinois Environmental Protection Agency
Bureau of Air
Compliance Section (MC 40)
P.O. Box 19276
Springfield, Illinois 62794-9276

- ii. Illinois EPA - Air Regional Field Office

Illinois Environmental Protection Agency
Division of Air Pollution Control
9511 West Harrison
Des Plaines, Illinois 60016

iii. Illinois EPA - Air Permit Section

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section (MC 11)
P.O. Box 19506
Springfield, Illinois 62794-9506

iv. USEPA Region 5 - Air Branch

USEPA (AE - 17J)
Air & Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604

- b. Unless otherwise specified in the particular provision of this permit, reports shall be sent to the Illinois EPA - Air Compliance Section with a copy sent to the Illinois EPA - Air Regional Field Office.

8.7 Obligation to Comply with Title I Requirements

Any term, condition, or requirement identified in this permit by T1, T1R, or T1N is established or revised pursuant to 35 IAC Part 203 or 40 CFR 52.21 ("Title I provisions") and incorporated into this permit pursuant to both Section 39.5 and Title I provisions. Notwithstanding the expiration date on the first page of this permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

9.1.1 The issuance of this permit does not release the Permittee from compliance with State and Federal regulations which are part of the Illinois State Implementation Plan, as well as with other applicable statutes and regulations of the United States or the State of Illinois or applicable ordinances, except as specifically stated in this permit and as allowed by law and rule [Section 39.5(7)(j)(iv) of the Act].

9.1.2 In particular, this permit does not alter or affect the following:

- a. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section;
- b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
- c. The applicable requirements of the acid rain program consistent with Section 408(a) of the CAA; and
- d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the CAA.

9.1.3 Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

The Permittee must comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the CAA and the Act, and is grounds for any or all of the following: enforcement action, permit termination, revocation and reissuance, modification, or denial of a permit renewal application [Section 39.5(7)(o)(i) of the Act].

The Permittee shall meet applicable requirements that become effective during the permit term in a timely manner unless an alternate schedule for compliance with the applicable requirement is established.

9.2.2 Duty to Maintain Equipment

The Permittee shall maintain all equipment covered under this permit in such a manner that the performance or operation of such equipment shall not cause a violation of applicable requirements.

9.2.3 Duty to Cease Operation

No person shall cause, threaten or allow the continued operation of any emission unit during malfunction or breakdown of the emission unit or related air pollution control equipment if such operation would cause a violation of an applicable emission standard, regulatory requirement, ambient air quality standard or permit limitation unless such malfunction or breakdown is allowed by a permit condition [Section 39.5(6)(c) of the Act].

9.2.4 Disposal Operations

The source shall be operated in such a manner that the disposal of air contaminants collected by the equipment operations, or activities shall not cause a violation of the Act or regulations promulgated thereunder.

9.2.5 Duty to Pay Fees

The Permittee must pay fees to the Illinois EPA consistent with the fee schedule approved pursuant to Section 39.5(18) of the Act, and submit any information relevant thereto [Section 39.5(7)(o)(vi) of the Act]. The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois Environmental Protection Agency, P.O. Box 19276, Springfield, Illinois, 62794-9276.

9.3 Obligation to Allow Illinois EPA Surveillance

Upon presentation of proper credentials and other documents, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Section 39.5(7)(a) and (p)(ii) of the Act and 415 ILCS 5/4]:

- a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

- d. Sample or monitor any substances or parameters at any location:
 - i. At reasonable times, for the purposes of assuring permit compliance; or
 - ii. As otherwise authorized by the CAA, or the Act.
- e. Obtain and remove samples of any discharge or emission of pollutants authorized by this permit; and
- f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source authorized by this permit.

9.4 Obligation to Comply with Other Requirements

The issuance of this permit does not release the Permittee from applicable State and Federal laws and regulations, and applicable local ordinances addressing subjects other than air pollution control.

9.5 Liability

9.5.1 Title

This permit shall not be considered as in any manner affecting the title of the premises upon which the permitted source is located.

9.5.2 Liability of Permittee

This permit does not release the Permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the sources.

9.5.3 Structural Stability

This permit does not take into consideration or attest to the structural stability of any unit or part of the source.

9.5.4 Illinois EPA Liability

This permit in no manner implies or suggests that the Illinois EPA (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the source.

9.5.5 Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege [Section 39.5(7) (o) (iv) of the Act].

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

A maintenance record shall be kept on the premises for each item of air pollution control equipment. As a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.

9.6.2 Records of Changes in Operation

A record shall be kept describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes [Section 39.5(12) (b) (iv) of the Act].

9.6.3 Retention of Records

- a. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit [Section 39.5(7) (e) (ii) of the Act].
- b. Other records required by this permit shall be retained for a period of at least 5 years from the date of entry unless a longer period is specified by a particular permit provision.

9.7 Annual Emissions Report

The Permittee shall submit an annual emissions report to the Illinois EPA, Compliance Section no later than May 1 of the following year, as required by 35 IAC Part 254.

9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7) (p) (v) of the Act, the Permittee shall submit annual compliance certifications. The compliance certifications shall be submitted no later than May 1 or more frequently as specified in the applicable requirements or by permit condition. The compliance certifications shall be submitted to the Air Compliance Section, Air Regional Field Office, and USEPA Region 5 - Air Branch. The addresses for the submittal of the compliance certifications are provided in Condition 8.6.4 of this permit.

- a. The certification shall include the identification of each term or condition of this permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.
- b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.
- c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

9.9 Certification

Any document (including reports) required to be submitted by this permit shall contain a certification by a responsible official of the Permittee that meets the requirements of Section 39.5(5) of the Act [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included as an attachment to this permit.

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit [Section 39.5(7)(o)(ii) of the Act].

9.10.2 Emergency Provision

- a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technology-based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:
 - i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency. Normally, an act of God such as lightning or flood is considered an emergency;
 - ii. The permitted source was at the time being properly operated;
 - iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission

limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and

iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in this permit.

b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations.

9.11 Permanent Shutdown

This permit only covers emission units and control equipment while physically present at the indicated source location(s). Unless this permit specifically provides for equipment relocation, this permit is void for the operation or activity of any item of equipment on the date it is removed from the permitted location(s) or permanently shut down. This permit expires if all equipment is removed from the permitted location(s), notwithstanding the expiration date specified on this permit.

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

This permit may be modified, reopened, and reissued, for cause pursuant to Section 39.5(15) of the Act. The filing of a request by the Permittee for a permit modification, revocation, and reissuance, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition [Section 39.5(7)(o)(iii) of the Act].

9.12.2 Reopening and Revision

This permit must be reopened and revised if any of the following occur [Section 39.5(15)(a) of the Act]:

- a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;
- b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program;

- c. The Illinois EPA or USEPA determines that this permit contains a material mistake or inaccurate statement when establishing the emission standards or limitations, or other terms or conditions of this permit; and
- d. The Illinois EPA or USEPA determines that this permit must be revised to ensure compliance with the applicable requirements of the Act.

9.12.3 Inaccurate Application

The Illinois EPA has issued this permit based upon the information submitted by the Permittee in the permit application. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation under Section 39.5(15) (b) of the Act.

9.12.4 Duty to Provide Information

The Permittee shall furnish to the Illinois EPA, within a reasonable time specified by the Illinois EPA any information that the Illinois EPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to the Illinois EPA copies of records required to be kept by this permit, or for information claimed to be confidential, the Permittee may furnish such records directly to USEPA along with a claim of confidentiality [Section 39.5(7) (o) (v) of the Act].

9.13 Severability Clause

The provisions of this permit are severable, and should any one or more be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected. The rights and obligations of the Permittee shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force [Section 39.5(7) (i) of the Act].

9.14 Permit Expiration and Renewal

The right to operate terminates on the expiration date unless the Permittee has submitted a timely and complete renewal application. For a renewal to be timely it must be submitted no later than 9 and no sooner than 12 months prior to expiration. The equipment may continue to operate during the renewal period until final action is taken by the Illinois EPA, in accordance with the original permit conditions [Section 39.5(5) (1), (n), and (o) of the Act].

10.0 ATTACHMENTS

10.1 Attachment 1 - Example Certification by a Responsible Official

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: _____

Name: _____

Official Title: _____

Telephone No.: _____

Date Signed: _____

10.2 Attachment 2 - Guidance on Revising This Permit

The Permittee must submit an application to the Illinois EPA using the appropriate revision classification in accordance with Sections 39.5(13) and (14) of the Act and 35 IAC 270.302. Specifically, there are currently three classifications for revisions to a CAAPP permit. These are:

1. Administrative Permit Amendment;
2. Minor Permit Modification; and
3. Significant Permit Modification.

The Permittee must determine, request, and submit the necessary information to allow the Illinois EPA to use the appropriate procedure to revise the CAAPP permit. A brief explanation of each of these classifications follows.

1. Administrative Permit Amendment
 - Corrects typographical errors;
 - Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the source;
 - Requires more frequent monitoring or reporting by the Permittee;
 - Allows for a change in ownership or operational control of the source where no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittees has been submitted to the Illinois EPA;
 - Incorporates into the CAAPP permit a construction permit, provided the conditions of the construction permit meet the requirements for the issuance of CAAPP permits; or
 - Incorporates into the CAAPP permit revised limitations or other requirements resulting from the application of an approved economic incentives rule, marketable permits rule, or generic emissions trading rule.
2. Minor Permit Modification
 - Do not violate any applicable requirement;

- Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;
- Do not require a case-by-case determination of an emission limitation or other standard, or a source-specific determination of ambient impacts, or a visibility or increment analysis;
- Do not seek to establish or change a permit term or condition for which there is no corresponding underlying requirement and which avoids an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
 - A federally enforceable emissions cap assumed to avoid classification as a modification under any provision of Title I of the CAA; and
 - An alternative emissions limit approved pursuant to regulations promulgated under Section 112(i)(5) of the CAA.
- Are not modifications under any provision of Title I of the CAA; and
- Are not required to be processed as a significant permit modification.

An application for a minor permit modification shall include the following:

- A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
- The source's suggested draft permit/conditions;
- Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and
- Information as contained on form 271-CAAPP for the Illinois EPA to use to notify USEPA and affected States.

3. Significant Permit Modification

- Applications that do not qualify as either minor permit modifications or as administrative permit amendments;
- Applications requesting a significant change in existing monitoring permit terms or conditions;
- Applications requesting a relaxation of reporting or recordkeeping requirements; and
- Cases in which, in the judgment of the Illinois EPA, action on an application for modification would require decisions to be made on technically complex issues.

An application for a significant permit modification shall include the following:

- A detailed description of the proposed change(s), including all physical changes to equipment, changes in the method of operation, changes in emissions of each pollutant, and any new applicable requirements which will apply as a result of the proposed change. Note that the Permittee need only submit revised forms for equipment and operations that will be modified.

The Illinois EPA requires the information on the following appropriate forms to be submitted in accordance with the proper classification:

- Form 273-CAAPP, REQUEST FOR ADMINISTRATIVE PERMIT AMENDMENT FOR CAAPP PERMIT; or
- Form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT; or
- Form 200-CAAPP, APPLICATION FOR CAAPP PERMIT (for significant modification).

Application forms can be obtained from the Illinois EPA website at <http://www.epa.state.il.us/air/forms>.

Note that the request to revise the permit must be certified for truth, accuracy, and completeness by a responsible official.

Note that failure to submit the required information may require the Illinois EPA to deny the application. The Illinois EPA reserves the right to require that additional information be submitted as needed to evaluate or take final action on applications pursuant to Section 39.5(5)(g) of the Act and 35 IAC 270.305.



Illinois Environmental Protection Agency
Division Of Air Pollution Control -- Permit Section
P.O. Box 19506
Springfield, Illinois 62794-9506

Application For Construction Permit (For CAAPP Sources Only)	For Illinois EPA use only
	I.D. number:
	Permit number:
	Date received:

This form is to be used by CAAPP sources to supply information necessary to obtain a construction permit. Please attach other necessary information and completed CAAPP forms regarding this construction/modification project.

Source Information		
1. Source name:		
2. Source street address:		
3. City:	4. Zip code:	
5. Is the source located within city limits? <input type="checkbox"/> Yes <input type="checkbox"/> No		
6. Township name:	7. County:	8. I.D. number:

Owner Information		
9. Name:		
10. Address:		
11. City:	12. State:	13. Zip code:

Operator Information (if different from owner)		
14. Name		
15. Address:		
16. City:	17. State:	18. Zip code:

Applicant Information	
19. Who is the applicant? <input type="checkbox"/> Owner <input type="checkbox"/> Operator	20. All correspondence to: (check one) <input type="checkbox"/> Owner <input type="checkbox"/> Operator <input type="checkbox"/> Source
21. Attention name and/or title for written correspondence:	
22. Technical contact person for application:	23. Contact person's telephone number:

This Agency is authorized to require and you must disclose this information under 415 ILCS 5/39. Failure to do so could result in the application being denied and penalties under 415 ILCS 5 et seq. It is not necessary to use this form in providing this information. This form has been approved by the forms management center.

Summary Of Application Contents

24.	Does the application address whether the proposed project would constitute a new major source or major modification under each of the following programs: a) Non-attainment New Source Review – 35 IAC Part 203; b) Prevention of Significant Deterioration (PSD) – 40 CFR 52.21; c) Hazardous Air Pollutants: Regulations Governing Constructed or Reconstructed Major Sources – 40 CFR Part 63?	<input type="checkbox"/> Yes <input type="checkbox"/> No
25.	Does the application identify and address all applicable emissions standards, including those found in the following: a) Board Emission Standards – 35 IAC Chapter I, Subtitle B; b) Federal New Source Performance Standards – 40 CFR Part 60; c) Federal Standards for Hazardous Air Pollutants – 40 CFR Parts 61 and 63?	<input type="checkbox"/> Yes <input type="checkbox"/> No
26.	Does the application include a process flow diagram(s) showing all emission units and control equipment, and their relationship, for which a permit is being sought?	<input type="checkbox"/> Yes <input type="checkbox"/> No
27.	Does the application include a complete process description for the emission units and control equipment for which a permit is being sought?	<input type="checkbox"/> Yes <input type="checkbox"/> No
28.	Does the application include the information as contained in completed CAAPP forms for all appropriate emission units and air pollution control equipment, listing all applicable requirements and proposed exemptions from otherwise applicable requirements, and identifying and describing any outstanding legal actions by either the USEPA or the Illinois EPA? Note: The use of "APC" application forms is not appropriate for applications for CAAPP sources. CAAPP forms should be used to supply information.	<input type="checkbox"/> Yes <input type="checkbox"/> No
29.	If the application contains TRADE SECRET information, has such information been properly marked and claimed, and have two separate copies of the application suitable for public inspection and notice been submitted, in accordance with applicable rules and regulations?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable, No TRADE SECRET information in this application

Note 1: Answering "No" to any of the above may result in the application being deemed incomplete.

Signature Block

This certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete.	
30.	I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate and complete. Authorized Signature: BY: _____ <div style="display: flex; justify-content: space-around; margin-top: 10px;"> <div style="text-align: center;"> _____ <small>AUTHORIZED SIGNATURE</small> </div> <div style="text-align: center;"> _____ <small>TITLE OF SIGNATORY</small> </div> </div> <div style="display: flex; justify-content: space-around; margin-top: 10px;"> <div style="text-align: center;"> _____ <small>TYPED OR PRINTED NAME OF SIGNATORY</small> </div> <div style="text-align: center;"> _____ / _____ / _____ <small>DATE</small> </div> </div>

Note 2: An operating permit for the construction/modification permitted in a construction permit must be obtained by applying for the appropriate revision to the source's CAAPP permit, if necessary.

10.4 Attachment 4 - Guidance on Renewing This Permit

Timeliness - Pursuant to Section 39.5(5)(n) of the Act and 35 IAC 270.301(d), a source must submit to the Illinois EPA a complete CAAPP application for the renewal of a CAAPP permit not later than 9 months before the date of permit expiration of the existing CAAPP permit in order for the submittal to be deemed timely. Note that the Illinois EPA typically sends out renewal notices approximately 18 months prior to the expiration of the CAAPP permit.

The CAAPP application must provide all of the following information in order for the renewal CAAPP application to be deemed complete by the Illinois EPA:

1. A completed renewal application form 200-CAAPP, APPLICATION FOR CAAPP PERMIT.
2. A completed compliance plan form 293-CAAPP, COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE FOR CAAPP PERMIT.
3. A completed compliance certification form 296-CAAPP, COMPLIANCE CERTIFICATION, signed by the responsible official.
4. Any applicable requirements that became effective during the term of the permit and that were not included in the permit as a reopening or permit revision.
5. If this is the first time this permit is being renewed and this source has not yet addressed CAM, the application should contain the information on form 464-CAAPP, COMPLIANCE ASSURANCE MONITORING (CAM) PLAN.
6. Information addressing any outstanding transfer agreement pursuant to the ERMS.
7. a. If operations of an emission unit or group of emission units remain unchanged and are accurately depicted in previous submittals, the application may contain a letter signed by a responsible official that requests incorporation by reference of existing information previously submitted and on file with the Illinois EPA. This letter must also include a statement that information incorporated by reference is also being certified for truth and accuracy by the responsible official's signing of the form 200-CAAPP, APPLICATION FOR CAAPP PERMIT and the form 296-CAAPP, COMPLIANCE CERTIFICATION. The boxes should be marked yes on form 200-CAAPP, APPLICATION FOR CAAPP PERMIT, as existing information is being incorporated by reference.

- b. If portions of current operations are not as described in previous submittals, then in addition to the information above for operations that remain unchanged, the application must contain the necessary information on all changes, e.g., discussion of changes, new or revised CAAPP forms, and a revised fee form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT, if necessary.
8. Information about all off-permit changes that were not prohibited or addressed by the permit to occur without a permit revision and the information must be sufficient to identify all applicable requirements, including monitoring, recordkeeping, and reporting requirements, for such changes.
9. Information about all changes made under 40 CFR 70.4(b)(12)(i) and (ii) that require a 7-day notification prior to the change without requiring a permit revision.

The Illinois EPA will review all applications for completeness and timeliness. If the renewal application is deemed both timely and complete, the source shall continue to operate in accordance with the terms and conditions of its CAAPP permit until final action is taken on the renewal application.

Notwithstanding the completeness determination, the Illinois EPA may request additional information necessary to evaluate or take final action on the CAAPP renewal application. If such additional information affects your allowable emission limits, a revised form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT must be submitted with the requested information. The failure to submit to the Illinois EPA the requested information within the time frame specified by the Illinois EPA, may force the Illinois EPA to deny your CAAPP renewal application pursuant to Section 39.5 of the Act.

Application forms may be obtained from the Illinois EPA website at <http://www.epa.state.il.us/air/forms.html>.

If you have any questions regarding this matter, please contact a permit analyst at 217/782-2113.

Mail renewal applications to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section (MC 11)
P.O. Box 19506
Springfield, Illinois 62794-9506

AB:psj